

Environmental Compliance Certification Program

Certification Workbook

For

Exterior Lead Paint Removal Contractors



March 2005



Rhode Island Department of Environmental Management
Office of Technical and Customer Assistance

235 Promenade Street

Providence, RI 02908

(401) 222-6822

www.dem.ri.gov

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Project Partners

U.S. Environmental Protection Agency
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Exterior Lead Paint Removal Program Steering Committee:

Ronald Gagnon, PE, RI Department of Environmental Management
Richard Enander, Ph.D., RI Department of Environmental Management
Thomas Armstrong, RI Department of Environmental Management
Ted Burns, RI Department of Environmental Management
Christopher John, RI Department of Environmental Management
Eugene Park, Ph.D., University of Rhode Island,
Center for Pollution Prevention & Environmental Health
James Bryson, Environmental Protection Agency, Region 1
Marie Stoeckel, MPH, CIH, RI Department of Health
Rosemary Aglione, RI Department of Health
David Spink, RI Department of Health
James Bruckshaw, RI Department of Health
Ruth Lindberg, RI Department of Health
Simon Kue, RI Housing Resources Commission

Authors: Thomas E. Armstrong, RIDEM
Richard Enander, Ph.D., RIDEM
Eugene Park, Ph.D., URI Center for Pollution Prevention &
Environmental Health



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Questions and/or Comments can be directed to:

Rhode Island Department of Environmental Management
Exterior Lead Paint Removal Certification Program
Office of Technical and Customer Assistance
235 Promenade Street
Providence, RI 02908-5767

Telephone (401) 222-6822, Ext. 4412

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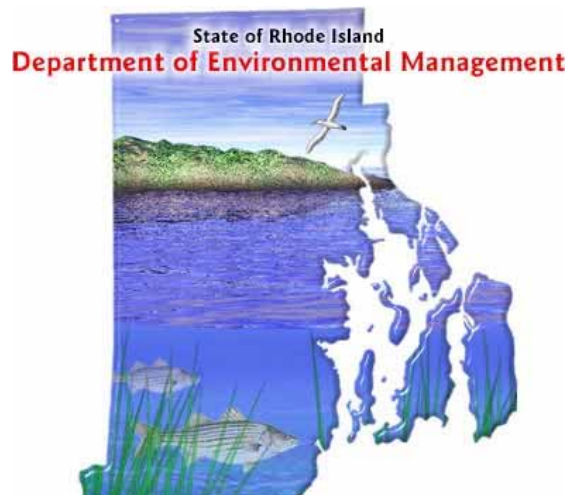
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NOTE: In order to keep this Workbook in good condition for use as a work reference, it is suggested that contractors put it in a three-ring binder, and carry it in the field when completing exterior lead paint removal projects.

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Section 1.0 - Overview



In order to improve environmental protection at less cost to both government and business, exterior lead paint removal contractors are offered the opportunity to self-certify to the Rhode Island Department of Environmental Management (DEM) that they are complying with the environmental protection requirements that apply to their business.

This new, common sense approach to regulation holds great promise for making it easier for the exterior paint removal industry to meet and surpass Rhode Island's environmental regulations. This workbook provides the information needed to help you understand the facts about lead, and to comply with state and federal environmental regulations. It was developed in collaboration with Department of Environmental Management, URI Center for Pollution Prevention & Environmental Health, and Department of Health representatives, as well as representatives from the Rhode Island Housing & Mortgage Finance Corporation. It contains the basic materials needed to understand environmental regulations and safe work practices related to exterior lead paint removal, and to complete and submit the self-certification Participation Form & Checklist. The program uses two documents:

1. Environmental Compliance Certification Workbook For Exterior Lead Paint Removal Contractors (This Workbook):

This workbook explains the environmental regulatory requirements and protection standards that apply to your business, and how to make sure you are complying with them. The workbook is designed to be used in conjunction with the accompanying self-certification Participation Form & Checklist, and can also be used as a reference.

The workbook also provides facts and information about lead, and worker protection and OSHA compliance, including outlining some practices and techniques that can help you minimize human health risks and environmental impacts. It includes RIDEM Regulation # 24, "Removal of Lead Based Paint from Exterior Surfaces", as well as sample forms for Notification of Removal of Lead Based Paint, the Exterior Lead Paint Removal Certification Program Participation Form & Checklist, and the Project Checklist.

2. Certification Checklist Package: This package includes certification instructions; the *Certification Participation Form & Checklist* that needs to be completed and submitted to DEM; the *Project Checklist* that is provided to the owner or occupant where exterior paint removal operations are being carried out; and blank forms, including the *Project Checklist*, that can be copied and used by paint removal contractors to assist in complying with federal and state regulatory and program requirements.

1.1 Who Does Self-Certification Apply To?

Participation in the program is voluntary. However, any business with operations involving removal of exterior lead paint should consider participating in the Self-Certification Program to take advantage of the educational and compliance assistance incentives detailed in Section 1.2.

It should be noted that all contractors performing exterior lead paint removal operations in the State of Rhode Island must comply with all applicable environmental regulations, whether or not they self-certify.

To participate in the program, please complete and return the Participation Form & Checklist as instructed.

1.2 What are the Benefits of Participation?

Benefits in participating in the program include:

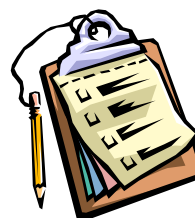
- Information and education on methods of complying with environmental regulations that apply to removing exterior lead paint
- Making you better prepared for a random inspection of work being performed
- Entitling you to free technical assistance from DEM's Office of Technical & Customer Assistance to comply with environmental regulations.
- Being placed on a public list of certified paint contractors on DEM's website
- Using your DEM Certification as a marketing tool with customers
- Receiving a Certificate of Participation from DEM
- Receiving educational and promotional materials

1.3 Program Requirements

To understand your environmental regulatory responsibilities, as well as gain some knowledge about worker protection and OSHA requirements, please read and use this Certification Workbook.

It should be noted that this program covers certification of environmental regulatory requirements pertaining to exterior lead paint removal, and does **not** cover OSHA requirements. Worker protection information and an overview of some OSHA requirements pertaining to exterior lead paint removal are presented in this workbook to help inform and educate. Please note, however, that as a lead paint removal contractor, it is your responsibility to comply with all applicable OSHA requirements.

It is easy to participate in the program. To do so, you must complete and submit to DEM:



1. Participation Form & Certification Checklist

This form is found in the Appendix of this workbook, as well as in the accompanying Certification Checklist Package. It contains a series of questions that pertain to contractor operating procedures and regulatory requirements - DEM Regulation # 24, "Removal of Lead Based Paint from Exterior Surfaces, Effective 27 April 1993", and the Federal Pre-Renovation Education Rule, for example. The form is submitted now, and every two (2) years to continue participation in the program. You should keep a copy of this completed form for your records.

Project Checklist - to be given to owner/occupant where paint removal operations are being conducted, does **not** need to be submitted to DEM:

This form is also found in the Appendix, as well as in the accompanying Certification Checklist Package. A copy of a completed Project Checklist must be given to the owner or occupant where paint removal operations are being conducted. It is not a program requirement to submit a copy of these forms to DEM, but you may keep copies of this form for your own records.

It is very important to remember that you must comply with all applicable federal and state environmental regulatory requirements, whether or not you participate in the program.

1.4 Overview of Lead Paint Regulation & Management in Rhode Island

In Rhode Island, regulatory authority and management for the removal of lead paint is divided between three state agencies, the Department of Environmental Management (DEM), the Department of Health (DOH), and the Housing Resources Commission. The Department of Health's Lead Hotline, at **(800) 942-7434**, is an important resource for lead poisoning prevention from either exterior or interior sources.

Exterior Lead Based Paint Removal



Regulatory authority and management for exterior lead based removal is vested in DEM. This certification program is applicable to exterior lead paint removal only.

The primary applicable regulation is DEM's Air Pollution Regulation # 24, Removal of Lead Based Paint from Exterior Surfaces. Contact information is provided below for various aspects of exterior lead paint management:

Air Pollution Regulation # 24 requirements, including Alternate Methods
DEM Office of Air Resources 222-2808

Enforcement of Air Pollution Regulation # 24
DEM Office of Compliance & Inspection 222-1360

Exterior Lead Paint Removal Certification Program, Compliance Assistance
DEM Office of Technical & Customer Assistance
222-6822, Ext. 4412

Interior Lead Based Paint Removal

HEALTH.ri.gov
Rhode Island Department of HEALTH

Regulatory authority and management for interior lead based removal is vested in DOH. This certification program does not apply to interior lead paint removal. DOH regulates all aspects of interior lead paint removal regulation & management including the licensing of Lead Hazard Reduction Contractors and Lead Safe

Remodeler/Renovators. The primary applicable regulation is DOH's "Rules & Regulations for Lead Poisoning Prevention" (R23-24.6-PB).

Contact information is provided below for various aspects of interior lead paint regulation and management:

Rhode Island Childhood Lead Poisoning Prevention Program (DOH)
800-942-7434 <http://www.health.ri.gov/lead/>

OSHA Consultation Program, DOH Office of Occupational & Radiological
Health (Health & Safety Compliance Assistance) 222-2438
<http://www.healthri.org/environment/occupational/consultation.php>

Lead Hazard Mitigation Law



Regulatory authority and management for residential rental units under Rhode Island's Lead Hazard Mitigation Law is vested in the Housing Resources Commission (HRC). Owners of residential rental properties must comply with Lead Hazard Mitigation requirements.

For more information, call HRC at (800) 570-0768, or visit their website at <http://www.hrc.ri.gov/mitigation.htm>.

Federal Lead Regulations & Lead-Safe Protection Programs

For further information on federal lead regulations and lead-safe protection programs, contact the following regional offices:

EPA Region 1: James M. Bryson, Regional Lead Contact
One Congress Street - Suite 1100 (CPT)
Boston, MA 02114-2023
(888) 372-7341 or (617) 918-1524
Email: bryson.jamesm@epa.gov
Website: http://www.epa.gov/region1/eco/ne_lead/index.html



Department of Housing & Urban Development
Providence Field Office
10 Weybosset Street, 6th Floor
Providence, RI 02903-2818
(401) 528-5230

Website: <http://www.hud.gov/offices/lead/index.cfm>



Occupational Safety & Health Administration
Providence Area Office
380 Westminster Street
Providence, RI 02903
(401) 528-4669

Website: <http://www.osha.gov>



U. S. Consumer Product Safety Commission
Eastern Regional Center
201 Varick Street, Room 903
New York, NY 10014-4811
(212) 620-4120

Website: <http://cpsc.gov>



1.5 What You Should Know About the Rhode Island Lead Law



Childhood Lead Poisoning Screening: All children under six years of age must be screened for lead poisoning annually. Lead screening is a simple blood test. Ask your doctor about getting a lead test for your child at your next visit. Call the Family Health Information Line at 1-800-942-7434 to learn how to protect your children from lead poisoning.

Lead Inspections: The Department of Health certifies inspectors who can test paint, soil, dust, and water in and around your home for lead. For a list of inspectors call 1-800-942-7434.

Lead Abatement: When removing interior lead based paint, you must follow state regulations. Lead abatement must be done by contractors certified by the Rhode Island Department of Health. These regulations apply to all places where children younger than six live, including rental units, owner-occupied homes, and foster homes. The regulations also apply to other places frequented by children such as day cares, schools, and playgrounds. For a list of licensed contractors call 1-800-942-7434. Exterior lead-based paint removal is regulated by the Rhode Island Department of Environmental Management. For information, call 222-1360.

Renovation/Remodeling: If you are planning a renovation or remodeling project that will disturb lead paint surfaces, you must follow state regulations. For information on how to safely conduct renovation work call 1-800-942-7434 and request a copy of the brochure, "Keep It Clean: An Insiders' Guide to Lead Safe Painting and Home Improvement". It can also be downloaded at http://www.epa.gov/ne/eco/ne_lead/keep_it_clean.html#kicc

Residential Rental Property: If you own a rental unit in Rhode Island, State law requires you to attend a Lead Hazard Awareness Seminar, and maintain your rental unit using approved lead hazard maintenance practices. For information, call (800) 570-0768 or visit <http://www.hrc.ri.gov/mitigation.html>

Financial Assistance: A state tax credit of up to \$1,000 per unit is available for some lead hazard reduction work. Call 222-1111 and ask for the "Residential Lead Abatement Credit Form". Call Rhode Island Housing & Mortgage Finance Corporation (RI HMFC) at 450-1350 for information about lead abatement loans. Window replacement loans may be available from RI SE Engineering. For more information call RI SE at 784-3700. For a list of resources, visit the Housing Resources Commission at <http://www.hrc.ri.gov/mitigation.html>.

Disclosure of Lead Hazards: R.I. law requires owners to disclose known information about lead exposure hazards and potential lead exposure hazards prior to sale or lease (written or oral) of most residential property in Rhode Island. The law requires:

- **Landlords and Sellers** to disclose available information about lead hazards or potential lead hazards, provide available reports, include a lead warning and disclosure acknowledgment statement in the lease or sales contract and give out this pamphlet before a lease takes effect or a buyer becomes obligated under a sales contract.
- **Sellers** must allow buyers a ten (10) day period to conduct a lead inspection or risk assessment (at the buyer's expense) before buyers become obligated under a sales contract.

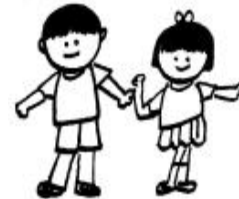
For education, advocacy, and parent support, call the Rhode Island Childhood Lead Action Project, at 785-1310.

Section 2.0 - Why Lead?

Lead is a highly toxic metal that was used for many years in products found in and around our homes. Lead may cause a range of health effects, from behavioral problems and learning disabilities, to seizures and death. Anyone can be lead poisoned, but lead is most dangerous for children younger than six years of age because their bodies are still developing. Lead can adversely affect their health and learning abilities. It is extremely important to know that exposure to low levels of lead can permanently affect children. In children, lead can cause:



- Nervous system and kidney damage
- Learning disabilities, decreased intelligence
- Speech, language, and behavior problems
- Poor muscle coordination
- Decreased muscle and bone growth
- Hearing damage
- Anemia



In adults, lead can cause:

- Increased blood pressure, anemia
- Fertility problems
- Nervous system disorders, muscle and joint pain, irritability, and memory or concentration problems.
- When a pregnant woman has an elevated blood lead level, that lead can easily be transferred to the fetus



Because of health concerns, lead and lead compounds were banned from house paint in 1978; from solder used on water pipes in 1986; from gasoline in 1995; from solder used on food cans in 1996; and from tin-coated foil on wine bottles in 1996.

Research suggests that the primary sources of lead exposure for most children are:

- Lead contaminated dust (it can form when lead-based paint is dry scraped, dry sanded, or heated at high temperatures)
NOTE: Lead dust is the # 1 cause of lead poisoning, not paint chips. It takes less dust than can be found in a packet of sugar to poison a child.

- Deteriorating lead-based paint
- Lead contaminated residential soil.

About dust, and why it is a PROBLEM. . . .

- **Dust & debris can contain lead, lead contaminated dust & debris is very toxic**
Very small amounts can poison children & adults
- **It's hard to sweep (and should NOT be swept up)**
Sweeping should not be used, clean with a HEPA-filtered vacuum, water, and detergent
- **It travels**
Once lead is released, it is easily tracked out of the work area. An exterior paint removal project can contaminate the inside of a home if lead dust, paint chips, and leaded soils are tracked inside.
 - Also, workers can bring lead contaminated dust home on clothing, shoes, hair, or skin, and poison their families.

Today, the US Department of Housing and Urban Development (HUD) estimates that about 38 million homes in the United States still contain lead paint. While lead paint in intact condition does not pose an immediate concern, lead paint that is allowed to deteriorate creates a lead-based paint hazard. According to the Department of Housing & Urban Development (HUD), about 25% of the nation's housing stock -- some 24 million homes -- contains significant lead-based paint hazards, such as deteriorating lead paint or lead-contaminated dust being produced. These are the homes producing the vast majority of the childhood lead poisoning cases we see today.

In the United States, about 900,000 children ages 1 to 5 have a blood-lead level above the level of concern (10 ug of lead per deciliter of blood)

Hence, state and federal agencies are very concerned about using proper renovation methods on homes containing lead-based paint, including the removal of exterior lead-based paint. Lead from paint chips and dust can pose serious health hazards if not taken care of properly.

2.1 Facts About Lead

Did you know the following facts about lead?

- FACT:** Lead exposure can harm young children and babies even before they are born.
- FACT:** Even children who seem healthy can have high levels of lead in their bodies.
- FACT:** A person can get lead into their body by breathing or swallowing lead dust, or by eating soil or paint chips containing lead.
- FACT:** There are many options for reducing lead hazards. In most cases, lead-based paint that is in good condition is not a hazard.
- FACT:** Removing lead-based paint improperly can increase the danger to human health.

2.2 What is lead-based paint, and why was lead used in paint?

Rhode Island Air Pollution Control Regulation # 24 considers exterior lead-based paint to be any paint or surface coating that contains more lead than 0.05% by weight, or 500 ppm.

Why was lead used in paint?

- **Primary pigment**
- **Added color**
- **Durability**
- **Drying agent**
- **Mildew Inhibitor**
- **Corrosion inhibitor**



Play it Safe! You should assume that any house built in 1978 or earlier contains lead-based paint unless the house has been tested, and the results indicate that the house does not contain lead-based paint.

Section 3.0 - DEM's Air Pollution Control Regulation # 24 Removal of Lead Based Paint from Exterior Surfaces

The complete text of this DEM regulation is located in the Appendix of this workbook. Below is a summary of the major requirements:



3.1 Overview of the Regulation

- ***Who does this regulation apply to?*** It applies to any person who removes lead paint from exterior surfaces, including contractors, homeowners, businesses, and governmental agencies.
- ***Is anyone exempted from this regulation?*** If a person tests exterior paint for lead and finds that no lead is present, then it is not necessary to comply with Regulation # 24. However, Air Pollution Control Regulation # 5 (Fugitive Dust), which may require that containment methods to be used during paint removal, must still be complied with.
- ***Who must be notified that exterior lead paint is to be removed?*** Adults in all residences (including the structure from which exterior paint is being removed), managers of businesses, and principals of schools, that are located within fifty (50) feet of the structure undergoing paint removal ***must be notified in writing at least five (5) days before the paint removal project begins.*** A sample Notification Form with the information required to be provided can be found in the Appendix section of this workbook.
- ***What preparations must be taken on site before lead paint removal has started?***
 1. All toys, play equipment and furnishings within fifty (50) feet of the paint removal project must be removed, or they must be covered with a leak proof material.
 2. Ground cover such as an impenetrable tarpaulin that has been anchored or weighted down must be used to collect paint debris.
 3. Vertical containment must be erected if paint debris is observed to be falling beyond the ground cover.

- ***What is required if exterior lead paint is being removed from structures other than buildings, such as fences, bridges and towers?***

A plan must be submitted to DEM's Office of Air Resources for approval ***before*** the paint removal takes place. The plan must describe the type of removal methods to be used, and describe what measures will be used to prevent contamination of the environment with lead. The plan must be submitted to:

DEM Office of Air Resources
Attn: Mr. Ted Burns
235 Promenade Street
Providence, RI 02908-5767
Telephone: (401) 222-2808
Fax: (401) 222-2017

3.2 Approved Exterior Paint Removal Methods

The following methods are allowed for removal of exterior lead paint:

1. ***Wet Manual Scraping*** - Must mist surfaces with water just prior to scraping, and keep surface wet until scraping is completed
2. ***HEPA Equipped Mechanical Sanding or Scraping*** - This method is allowed provided that the sander or scraper used is equipped with a HEPA (high efficiency particulate air) vacuum unit. When this method is used, the sanding pad or scraping disc cannot be wider than the shingle or clapboard exposure, all doors and windows on the paint removal side of the building must be closed and sealed, and air conditioners must be shut off and covered.
3. ***HEPA Equipped Dry Abrasive*** - With this method, the abrasive-blasting system must be equipped with a HEPA vacuum that collects paint debris at the blasting head. All doors and windows on the paint removal side of the building must be closed and sealed, and air conditioners must be shut off and covered.
4. ***Hydroblasting, or Wet Abrasive*** - With this method, upright containment must be used to prevent any and all debris generated by the operation from going beyond the ground sheeting. Any and all liquid waste containing lead must be collected and handled in accordance with DEM Solid and Hazardous Waste Regulations.

5. ***Heat Removal*** – No open flame is permitted, such as the use of torches. The temperature of heat gun devices used cannot exceed 1000⁰ F.
6. ***Chemical Removal*** – Paint strippers are allowed as long as the stripper is nonflammable, and contains no methylene chloride.

If alternative methods of paint removal are to be used, including high pressure power washing that removes lead paint, a description of the methods must be submitted to DEM Office of Air Resources (contact information found above) and approved, prior to use of the methods.

3.3 Cleanup Methods

1. ***At the end of the work day*** – All lead paint related debris, including liquid waste, must be collected and placed in containers, and stored in plastic bags in an area not easily accessible to the public. All sheeting must be removed from the paint removal area and stored away from public access. The area must be inspected for any leftover paint debris.
2. ***At the end of the project*** – All containers of lead paint related debris and liquid waste, including ground covers must be disposed of properly. The area must be inspected for any leftover paint debris.

3.4 Disposal Methods

Lead paint and debris must be disposed of in accordance with DEM Solid & Hazardous Waste Regulations, using one of the following methods:

1. Disposed of as household solid waste by homeowner/occupant, through use of curb-side collection, a community sponsored transfer station, or household hazardous waste collection.
2. Removed from site and tested to determine whether material is solid waste or hazardous waste; with disposal through an intermediate facility, that facility could be considered a generator of hazardous waste. (see Disposal Guidelines)
3. Removed from commercial or industrial property, managed per DEM “Rules & Regulations for Hazardous Waste Management”.

Section 4.0 - Federal Pre-Renovation Education Rule

The Federal Pre-Renovation Education Rule was issued under the authority of Section 406(b) of Title IV of the Toxic Substances Control Act (TSCA). It requires that contractors, property managers, and others who perform renovations (including paint removal) for compensation in residential housing that may contain lead based paint provide lead information to residents before renovating. It applies to residential houses and apartments built before 1978, and renovations include most repairs, remodeling, and maintenance activities that disturb painted surfaces. This rule is based on concern that potential lead exposure risks could occur during renovations of housing containing lead-based paint, and the belief that informed owners and occupants scheduled for renovation could take actions to avoid lead exposure to themselves and their families.

4.1 "Protect Your Family from Lead in Your Home"

Contractors, property managers, and others who perform renovations (including paint removal) for compensation are required to provide the pamphlet *"Protect Your Family from Lead in Your Home"* to owners and occupants, and receive a signed statement of receipt of the pamphlet **BEFORE** work has begun on the project. An alternate method to comply with this requirement is to mail the pamphlet at least seven (7) days prior to the renovation, and document with a certificate of mailing from the post office.



If the housing is tenant occupied, then the contractor must provide copies of the pamphlet to both the owner and the tenant, and receive signed statements of receipts from both. Signed statements must be retained by the contractor for a period of three years. A sample form for this receipt is found in the Appendix and in the Certification Checklist Package, and can be copied and used to make documentation of compliance easier.

In renovations of common areas (including the dwelling's exterior surface) of multi-family housing (more than four units), the contractor must provide the owner with the pamphlet (as outlined above), notify the tenants of the nature, location, and timing of the renovation; and make the pamphlet available to tenants. Also in this situation, signed statements must be retained by the contractor for a period of three years. Sample forms for Renovation Notice and Notification Procedures for

this receipt requirement are found in the Appendix and in the Certification Checklist Package, and can be copied and used.

The pamphlet, written in an easy-to-understand format that includes graphics and contains information about lead paint in housing, the risks of lead exposure, and precautions that can be taken to avoid exposure. It can be downloaded from EPA's website at <http://www.epa.gov/lead/leadprot.htm>, and it is available in Spanish and Vietnamese as well as English. It can also be obtained in English or in Spanish by calling the Rhode Island Family Health Information Line at (800) 942-7434.

4.2 Requirements

Section 406(b) requirements must be met by anyone whose paid work disturbs paint (more than 2 sq. ft. of painted surface) in housing built before 1978. It includes work performed by residential rental property owners, managers, and maintenance staff, general contractors, special trade contractors such as painters, plumbers, carpenters, electricians, and home improvement contractors.



Contractors are strongly encouraged to read EPA's sixteen (16) page handbook entitled ***"The Lead-Based Paint Pre-Renovation Rule"***, found at <http://www.epa.gov/lead/interiorfinal2.pdf>. It contains information that will be helpful in understanding and complying with the rule.

4.3 Exemptions from the Rule

The federal rule does not apply in the following situations:

- Lead abatement activities carried out by certified lead abatement contractors
- Minor exterior repairs or maintenance that disturbs two (2) square feet or less of painted surface
- When surface to be painted is not disturbed by sanding, scraping, or other activities that may cause dust
- Housing that was built in 1978 or later
- Housing for the elderly or disabled persons (unless children live there)
- Housing or components declared lead-free by a certified inspector or risk assessor
- Emergency renovations and repairs (hazardous, non-routine situation that could either threaten public health or cause substantial property damage)
- Work performed for free, with no exchange of money, goods, or services
- Work performed by do-it-yourselfers on their own homes

Section 5.0 - Lead-Safe Paint Removal Management Practices



Considering the dangers posed by lead, practicing good exterior lead paint removal management practices is critical. By using safe work practices, you can control and significantly reduce the amount of dust created on the job. It is important to recognize that lead paint removal in remodeling and repairs is not lead paint abatement. Abatement refers to work being done specifically to permanently remove lead-based paint hazards.

Below are some major points to consider in planning and completing an exterior lead paint removal project:

5.1 Before beginning the job, the following steps need to be completed:



- Provide educational pamphlets to owners and residents, and notification that lead paint removal will be taking place, in accordance with the federal Pre-Renovation Pre-Education Rule outlined in Section 4.0.
- Provide notifications in writing to adults in all residences (including the structure from which exterior paint is being removed), managers of business, and principals of schools, that are located within fifty (50) feet of the structure undergoing paint removal, in accordance with DEM Air Pollution Control Regulation # 24, outlined in Section 3.0.
- Keep owners and residents out of the immediate work area, especially children and pregnant women, until cleanup has been completed. Use barricade tape, cones, or saw horses to limit access to the work area. In limiting access, establish a twenty (20) foot perimeter around the work area if space permits.
- Remove outdoor furniture and play equipment within fifty (50) feet of the work area, or cover with 6 mil plastic secured and fastened in place.
- Close all windows and doors within twenty feet of the work area, turn off forced-air heating and air conditioning, cover vents with 6 mil plastic taped securely in place.

- Set up and anchor ground cover, such as 6 mil plastic or an impenetrable tarpaulin, and have material ready to set up vertical containment if it is necessary to use it.

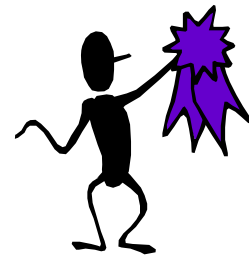
5.2 Before beginning work, make sure that you have the proper equipment for the job:

- ✓ Protective equipment such as safety glasses, disposable gloves, painter's hat, disposable shoe covers, protective clothing, and NIOSH approved respirator or dust mask with HEPA filter (N-100 rated)
- ✓ Pre-moistened disposable wipes (no baby wipes)
- ✓ Tack pads
- ✓ 6 mil drop cloths/ground covering
- ✓ Duct tape, utility knife
- ✓ All purpose cleaner, mops and buckets
- ✓ Spray bottles, plant misters
- ✓ Heavy duty plastic bags for debris disposal
- ✓ Disposable hand towels
- ✓ HEPA vacuum/equipment with HEPA filter vacuum attachment
- ✓ Heat gun with temperature that never exceeds 1000⁰ F
- ✓ Ear protection for using power tools
- ✓ First aid kit



5.3 While working:

1. Choose work methods that will create the least amount of dust, including:
 - Keep surfaces wet by misting, then hand sand or scrape
 - Use HEPA equipped sanding and scraping equipment and vacuums
 - If heat is to be used, use a heat gun that preferably does not exceed 700⁰ F, but in no case exceeding 1000⁰ F
 - If chemical paint strippers are used, they must be non-flammable, and **contain no methylene chloride**
2. Be careful not to track dust or paint chips out of the work area. Misting drops cloths will help to keep dust down



3. Keep dust and debris in the smallest possible area, minimize the spread of dust
4. Clean frequently as you work, this reduces the spread of dust and paint chips
5. Don't eat, drink, or smoke while in the work area

Other Safe Work Practices:

Some other safe work practices to employ on the job include:

- Mist before drilling and cutting, to reduce creating dust and keeping dust from becoming airborne
- Use shaving cream or foam prior to drilling
- Score paint before separating components helps to prevent paint from chipping when a paint seal is broken
- Pry or pull apart components rather than pounding to create less dust
- Using power tools on heavily misted surfaces can be dangerous if they are wet. Water can cause electric shock and tool blades can slip
- When misting, lightly mist the work surface, and use hand tools

Do NOT use the paint removal methods listed below, they are dangerous and in violation of DEM Air Pollution Control Regulation # 24:

- X Do not dry scrape or dry sand
- X Do not use an open flame or torch to burn off paint
- X Do not use heat guns exceeding 1000⁰ F
- X Do not power sand or grind unless a HEPA filter equipped sander or grinder is used
- X Do not sand blast unless system is equipped with a HEPA filter at the blasting head
- X Do not use flammable strippers, or strippers containing methylene chloride, which is toxic
- X **Never** burn leaded debris, including debris containing paint chips or dust



When Leaving the Work Site:

- Remove shoe coverings, wipe shoes or vacuum with HEPA vacuum
- Use tack pads
- Vacuum protective clothing with a HEPA vacuum before removing it

- At the end of the day before leaving the work site:
 - change clothing and shoes
 - place work clothing in plastic bag and wash separately from household laundry
 - wash face and hands
 - shower as soon as you get home

5.4 When cleaning up:

- Clean all surfaces, tools, and clothing
- Visually inspect beyond the work area
- Mist drop/ground cloths, carefully roll or fold inward, and place plastic in single 6-mil or double 4-mil plastic bags
- Mist all dust and chips, and place in plastic bags
- Tie off tops of trash bags with duct tape with a "gooseneck seal", and dispose in accordance with Regulation # 24



Although not addressed in Regulation # 24, leftover materials meeting the requirements of a hazardous waste, such as leftover oil based paint or paint thinner requiring disposal, must be disposed of in accordance with the DEM "Rules & Regulations for Hazardous Waste Management".

The Environmental Protection Agency and the Department of Housing & Urban Development have developed an internet-based training course to instruct painters, renovators, and maintenance personnel about how to work safely in homes with lead based paint. EPA, DEM, and DOH ***strongly*** recommend this training for all contractors who perform renovation, remodeling, painting, and maintenance in residential housing built before 1978 to protect the families that live in these homes as well as the workers and their families.



This program addresses all phases of working lead-safe, including planning, setup, safe work practices, cleanup, and checking the work. It can be found at <http://www.epa.gov/lead/epahudrrmodel.htm>.

Section 6.0 - Worker Health & Safety Information

As noted earlier in this workbook, this program does not cover certification of the Occupational Safety & Health Administration (OSHA) worker health and safety requirements. Fact sheets produced by OSHA are presented on the following pages as educational resources for worker health and safety issues relating to lead exposure. They should not be construed to show all information necessary to comply with OSHA requirements relating to Lead (found in 29 CFR 1926.62), but as general information and guidelines.

These OSHA regulations [29 CFR 1926.62] apply to all employers involved with construction work where an employee may be occupationally exposed to lead, including removal of lead-based paint. OSHA has comprehensive regulations that call for blood-lead monitoring of employees, the use of respirators and air monitoring. The requirements for a particular case depend on the removal method used and the lead concentrations in the air.

Non-regulatory OSHA Compliance Assistance can be obtained from the Department of Health's OSHA Consultation Program. The program offers on-site and off-site health and safety technical assistance at no cost, and can be reached by calling 222-2438. Information provided such as business/owner name, plus any unsafe or unhealthful working conditions that the consultant uncovers, will be kept confidential.

The requirements of the Occupational Safety & Health Act do not apply to self-employed persons, or sole proprietors with no employees. But in any case, these persons are still encouraged to review good health and safety practices promoted in the OSHA requirements.

More information on this topic can also be obtained from federal OSHA at 528-4669, or the Rhode Island Committee on Occupational Safety & Health (RICOSH) at 751-2015.



Excerpts from OSHA Fact Sheets

LEAD EXPOSURE IN CONSTRUCTION WORKER PROTECTION

Significant lead exposures can also arise from removing paint from surfaces previously coated with lead-based paint, such as in bridge repair, residential renovation, and demolition.

The employer of construction workers is responsible for the development and implementation of a worker protection program in accordance with 29 CFR 1926.20 and 29 CFR 1926.62(e). This program is essential in minimizing worker risk of lead exposure. Construction projects vary in their scope and potential for exposing workers to lead and other hazards. Many projects may involve limited exposure, such as the removal of paint from a few interior residential doors. Others may involve the removal, or stripping off, of substantial quantities of lead-based paints on large bridges. The employer should, as needed, consult a qualified safety and health professional to develop and implement an effective worker protection program.

At the minimum, the following elements should be included in the employer's worker protection program for employees exposed to lead:

- Hazard determination, including exposure assessment;
- Engineering and work practice controls;
- Respiratory protection program when respirators are provided;
- Protective clothing and equipment;
- Housekeeping;
- Hygiene facilities and practices;
- Medical surveillance and provisions for medical removal;
- Training;
- Signs;
- Record keeping;
- Change areas for employees;
- Washing facilities for employees

CAUTION: Clothing contaminated with lead. Do not remove dust by blowing or shaking. Dispose of lead- contaminated wash water in accordance with applicable local, state, or federal regulations.

LEAD EXPOSURE IN CONSTRUCTION MEDICAL SURVEILLANCE

At a minimum, the following elements must be addressed in the employer's medical surveillance program for employees exposed to lead:

- Biological monitoring to identify employees with elevated blood lead levels
- Obtain a written signed opinion from the examining physician for each medical examination performed for each employee
- Medical removal from exposure of employees with blood lead level of 50ug/dl or above
- Meet employee exposure and medical records record keeping requirements, including
Employers must properly record cases on their OSHA form 300 when the worker:
 - has a blood lead level that exceeds 50 mg/dl;
 - has symptoms of lead poisoning, such as colic, nerve damage, renal damage, anemia, or gum problems; or
 - receives medical treatment to lower blood lead levels or for lead poisoning

This information is provided as excerpts from fact sheets provided by the Occupational Safety & Health Administration (OSHA), in the U. S. Department of Labor. It is intended as a general description only, and does not carry the force of legal opinion.

The fact sheets, and additional information about lead exposure in construction, can be found on OSHA's website at <http://www.osha.gov/SLTC/constructionlead/index.html>

The information will be made available to sensory impaired individuals upon request.

Voice phone: (202) 219-8151. TDD message referral phone: 1-800-326-2577.

Section 7.0 - Licensed Environmental Laboratories



Local laboratories licensed by the Rhode Island Department of Health that provide services to test for environmental lead:

ESS Laboratory

185 Frances Avenue

Cranston, RI 02910

(401) 461-7181

License # 179

<http://www.esslaboratory.com/>

Licensed tests: Lead in soil, paint chips, dust wipes

New England Testing Lab Inc.

1254 Douglas Avenue

North Providence, RI 02904

(401) 353-3420

License # 4

<http://www.newenglandtesting.com/index.html>

Licensed tests: Lead in soil, paint chips, dust wipes

Northeast Environmental Testing Laboratory Inc.

472 Smith Street

Providence, RI 02908

(401) 454-3400

License # 119

Licensed tests: Lead in soil, paint chips

Rhode Island Analytical Laboratories Inc.

41 Illinois Avenue

Warwick, RI 02888

(401) 737-8500

License # 33

<http://www.rianalytical.com/>

Licensed tests: Lead in soil, paint chips, dust wipes

Also, the Rhode Island Department of Health Laboratory is licensed to test for environmental lead in soil, paint chips, and dust wipes, but currently does not accept environmental lead samples from the public.

Out-of-state laboratories certified to test for environmental lead can also be used. This information can be obtained from the American Industrial Hygiene Association at <http://www.aiha.org/qs/Reports/scopeSearch.aspx>, and selecting "ELLAP" from the drop-down menu under "Accreditation Program".

Section 8.0 - Additional Information

The following information is provided as sources of additional resources about lead, and lead paint removal and management.

Web Resources:

The following provides websites that provide a wide variety of information about lead, lead paint management, education and outreach, programs, and documents, and rules and regulations.



- U. S. Environmental Protection Agency, Lead in Paint, Dust, & Soil
<http://www.epa.gov/lead/>
- U. S. Environmental Protection Agency Region 1, Lead in New England
http://www.epa.gov/region1/eco/ne_lead/index.html
- U. S. Department of Housing & Urban Development, Office of Healthy Homes and Lead Hazard Control
<http://www.hud.gov/offices/lead/>
- Centers for Disease Control & Prevention, National Center for Environmental Health, Childhood Lead Prevention Program
<http://www.cdc.gov/nceh/lead/lead.htm>
- National Lead Information Center (provides the general public and professionals with information about lead hazards and their prevention)
<http://www.epa.gov/lead/nlic.htm>, or call 800-424-LEAD (424-5323)
- Occupational Health & Safety Administration (OSHA)
(Health & Safety Topics: Lead)
<http://www.osha.gov/SLTC/lead/index.html>, or call 401-528-4669
- Rhode Island Childhood Lead Poisoning Prevention Program,
Rhode Island Department of Health
<http://www.health.ri.gov/lead/>
- Childhood Lead Action Project (RI) (works to eliminate childhood lead poisoning in Rhode Island through education, parent support, and advocacy)
<http://www.leadsafekids.org/index.htm>

Other Resources:

Family Health Information Line – Rhode Island Department of Health
Division of Family Health
(800) 942-7434

Rhode Island Housing Resources Commission – Lead Mitigation Information
<http://www.hrc.ri.gov/mitigation.html>, or call 401-450-1350

Other References:

The following provides information about other documents and brochures that are available to help you to better understand and work with lead paint removal safely.



- *Lead Paint Safety: A Field Guide for Painting, Home Renovation Work*
(U. S. Department of Housing & Urban Development, Office of Healthy Homes & Lead Hazard Control)
This helpful guide includes step-by-step instructions with illustrations that explain and show what you need to know to protect yourself and building residents if working in older homes that may contain lead paint. Single copies of this publication can be obtained on paper or CD-ROM from the National Lead Information Center at 800-424-LEAD (424-5323). It can also be downloaded from <http://www.epa.gov/lead/leadsafetybk.pdf>, or in Spanish from <http://www.hud.gov/offices/lead/training/LeadGuide-Sp-6-5.pdf>.
- *Lead In Your Home: A Parent's Reference Guide*
(U. S. Environmental Protection Agency)
This guide includes information about lead, reducing the risk of lead in the home, protecting children from lead poisoning, planning and working safely with lead paint removal projects, interim controls and abatement, and cleaning up lead waste. A copy of this publication can be obtained from the National Lead Information Center at 800-424-LEAD (424-5323). It can also be downloaded from <http://www.epa.gov/lead/leadrev.pdf>.

Additionally, the National Lead Information Center (NLIC) provides the general public and professionals with information about lead hazards and their prevention. NLIC operates under a contract with the U.S. Environmental Protection Agency

(EPA), with funding from EPA, the Centers for Disease Control and Prevention, and the Department of Housing and Urban Development.

The NLI C can be reached by telephone Monday through Friday, 9:00 am to 7:00 pm eastern time (except Federal holidays) at **1(800) 424-LEAD [5323]**, to speak with a specialist. The Center receives recorded messages in English and Spanish 24-hours a day, seven days a week.

The website address is <http://www.epa.gov/lead/nlic.htm>. The website has the capability of receiving your comments, questions, and/or document requests.

APPENDIX





AIR POLLUTION CONTROL REGULATION NO. 24
REMOVAL OF LEAD BASED PAINT FROM EXTERIOR SURFACES

24.1 Definitions

As used in these regulations, the following terms shall, where the context permits, be construed as follows:

- 24.1.1 "Abrasive blasting" means the procedure of removing paint from a surface by forcefully applying an abrasive material to the paint containing surface.
- 24.1.2 "HEPA" or "high efficiency particulate air" means a filter capable of filtering out particles of 0.3 microns or greater from a body of air at 99.97 percent efficiency or greater.
- 24.1.3 "Hydroblasting" means any abrasive blasting using high pressure liquid as the propelling force.
- 24.1.4 "Impenetrable material" means a material that will not allow any spent abrasives, paint, dust and/or other debris, including all residues generated by wet paint removal operations, to penetrate through it.
- 24.1.5 "Lead-based substance" means any paint or other surface coating material containing more than 0.05percent lead by weight calculated as lead metal in the dried solid.
- 25.1.6 "Lead based paint" means any surface coating material that contains more than 0.05 percent lead by weight calculated as lead metal in the dried solid.
- 24.1.7 "Mechanical paint removal" means the use of any force, including but not limited to manual, mechanical, electrical or other power, applied to a device to remove paint from a surface.

- 24.1.8 "Paint" means any surface coating material.
- 24.1.9 "Paint stripper" means any chemical and/or caustic substance applied to a surface for the purpose of removing paint.
- 24.1.10 "Person" means an individual, trust, firm, joint stock company, corporation (including quasi-governmental corporation), partnership, association, syndicate, municipality, municipal or state agency, fire district, club, non-profit agency or any subdivision, commission, department, bureau, agency or department of state or federal government (including quasi-governmental corporation) or of any interstate body.
- 24.1.11 "Representative sample" means a sample of any paint, including a sample of each layer of paint which is on a structure, that may and/or will be removed from a structure.
- 24.1.12 "Sandblasting" means abrasive blasting.
- 24.1.13 "Vacuum blasting" means any abrasive blasting in which the spent abrasive, paint, dust and/or other debris are immediately collected by a vacuum device.
- 24.1.14 "Wet abrasive blasting" means any abrasive blasting using compressed air as the propelling force in combination with water to contain the spent abrasive, paint, particulate, dust and/or other debris generated by the operations.

24.2 Applicability and Exemptions

24.2.1 Applicability

The provisions of this regulation shall apply to all persons engaging in the removal of a lead based substance from exterior surfaces of buildings and/or other structures, unless exempted below.

24.2.2 Exemptions

Removal of paint, that is not a lead based substance, from a surface shall be exempted from this regulation. To qualify for this exemption, a representative sample of any paint, which is to be removed from any surface, must be tested prior to the initiation of paint removal and must contain no more than 0.05% lead by weight calculated as lead metal in the dried solid. The person performing the paint removal operation is responsible for determining if lead paint is present on the structure. Paint removal operations which are exempt from the requirements of this regulation must comply with the requirements of Air Pollution Control Regulation No. 5 "Fugitive Dust".

24.3 Notification requirements

- 24.3.1 The following persons shall be notified in writing, by the person conducting the removal operation, at least five days prior to the beginning of any lead paint removal from the exterior surface of any structure:
- (a) adults residing in the structure from which the lead paint is being removed and/or residing within 50 feet of the structure from which lead paint is being removed, and
 - (b) the owner, agent, and/or property manager of the structure from which the lead paint is being removed and/or of any building located within 50 feet of the structure from which lead paint is being removed, and
 - (c) the owner, agent or manager of any business or organization located in the structure from which the lead paint is being removed and/or within 50 feet of the structure from which lead paint is being removed, and
 - d) the principal of every school and the chief administrative officer of every school within 50 feet of the structure from which lead paint is being removed.

24.3.2 The notification shall include, at a minimum, the following information:

- (a) the location of the structure from which the lead paint is to be removed,
- (b) the expected start and completion dates for the lead paint removal project,
- (c) the lead paint removal procedure to be used, and
- (d) the name, address and telephone number of the individual or company responsible for the lead paint removal.

24.3.3 In addition, the notification shall include the following statement: "The paint which will be removed from this structure contains lead. Exposure to lead is unhealthful, particularly to young children. Contact the Department of Environmental Management, Division of Air Resources, at 277-2808 for more information."

24.3.4 Any and all parties identified in section 24.3.1 must be notified in writing of any changes in the information included in the original notice.

24.4 Requirements for Preparation of Work Area:

24.4.1 The following procedures must be followed prior to the initiation of lead paint removal from any exterior surfaces of buildings:

- (a) Remove or cover with an impenetrable material all toys, play equipment and furnishings within a minimum of 50 feet, and/or any other distance which spent abrasive, paint, particulate, dust and/or other debris generated by the removal operations may travel, from a surface from which lead based paint is being removed.
- (b) Place an impenetrable material on the ground, at the paint removal worksite, to keep any and all spent abrasive, paint, particulate, dust and/or other debris generated by the paint removal operation from being deposited on the ground. If

a wet removal system is to be used, procedures must be employed to contain any and all residues generated by the wet abrasive blasting operations.

- (b) The ground sheeting must be attached to ground by staking, weighing down or any other method to insure that it remains in place during the paint removal operation.
- (d) If abrasive blasting, machine sanding or machine scraping is to be employed, close all doors and windows on the walls to be blasted or sanded and securely seal them from the outside. Air conditioning units on these and adjacent walls must be turned off and covered.
- (e) Erect vertical containment shrouds if there is visible movement of abrasive material, paint, dust and/or other debris beyond ground sheeting.
- (f) If a wet removal procedure is to be used, a system must be in place prior to initiation of the removal which allows liquid waste to be collected from the ground containment and placed into appropriate containers for proper disposal.

24.4.2 Site preparation for exterior paint removal from structures other than buildings must be adequate to prevent spent abrasive material, paint, particulate, dust and/or other debris from being deposited on the ground or in water or traveling offsite. Prior to removing paint from structures other than buildings, the person performing the paint removal work and/or the contractor responsible for the removal operation must submit a plan, that describes the procedure to be employed, to the Division for approval. The paint removal operation must not be initiated until written approval is issued by the Division.

24.5 Requirements for Removal of Lead Paint Using Heat Based Methods

24.5.1 Open flame burning shall not be used to remove paint from exterior surfaces.

- 24.5.2 Heat guns and/or any other device used for removal of paint from exterior surfaces must be operated such that the temperature of the gun and/or other device does not exceed 1000°F.
- 24.6 Requirements for Removal of Lead Paint Using Chemical Based Methods
 - 24.6.1 Flammable paint strippers and paint strippers containing methylene chloride shall not be used to remove paint from exterior surfaces.
 - 24.6.2 Non-flammable paint strippers which do not contain methylene chloride may be used for the removal of exterior paint provided that the manufacturers instructions for use of the paint stripper are followed.
- 24.7 Requirements for Removal of Lead Paint Using Mechanical Methods
 - 24.7.1 Machine sanding and/or machine scraping shall be allowed only if the unit is controlled by a HEPA vacuum unit which immediately collects any and all spent abrasive, paint, particulate, dust and/or other debris generated by the operations. The sanding and/or scraping disk must not be wider than the direct surface upon which it is being applied.
 - 24.7.2 Exterior surfaces must be misted with water prior to manual scraping. Dry scraping is not allowed.
- 24.8 Requirements for Removal of Lead Paint Using Abrasive Blasting
 - 24.8.1 Dry abrasive blasting shall be allowed only if any and all spent abrasive, paint, particulate, dust and/or other debris generated by the blasting is immediately collected by a HEPA vacuum unit. Any person using a vacuum blast system must comply with the manufacturers' guidelines when using the system.

24.8.2 Hydroblasting or wet abrasive blasting may be used for exterior lead paint removal provided that a vertical containment system is employed that prevents any and all fallout generated by the operation from travelling beyond the ground containment. Additionally any and all liquid waste generated by the operation must be adequately contained and handled in accordance with applicable waste disposal regulations.

24.9 Alternative Procedures for Removal of Paint Containing Lead

24.9.1 The Division may, on a case by case basis, allow an alternative procedure for removing paint containing lead provided that the person who uses this procedure shall submit to the Division, in writing, a description of the procedure which demonstrates to the satisfaction of the Division that the proposed alternative provides an equivalent control efficiency to the methods which are contained in sections 24.5, 24.6, 24.7 and 24.8. Use of an alternative procedure shall not begin until a written approval is issued by the Division.

24.10 Requirements for Site Cleanup

24.10.1 At the end of each workday, the following procedures must be followed:

- (a) If a dry removal procedure was used, spray any and all spent abrasive, paint, particulate, dust and/or other debris present on ground sheeting and/or other containments with a fine mist of water and collect the residue and place it in an appropriate container.
- (b) Visually inspect all areas, including areas that extend beyond the sheeted area, to determine whether any spent abrasive, paint, particulate, dust and/or other debris has escaped containment. If any spent abrasive, paint, particulate, dust and/or other debris generated by the lead paint removal operation is observed it must be collected

and placed in single 6-mil or double 4-mil plastic bags or another appropriate container.

- (c) If bags are used they must not be overloaded. Bags must be securely sealed and stored in such a way that they are not easily accessible to the public.
- (d) Liquid waste must be collected and stored in appropriate containers. Containers must be securely sealed and stored in a manner such that they are not easily accessible to the public.
- (e) Plastic sheets used for exterior containments, such as ground sheeting and vertical shrouds, must be removed and stored in a manner such that they are not easily accessible to the public.

24.10.2 At the completion of a lead paint removal project, or at the time when all lead paint that is to be removed from a structure has been removed, the following procedures must be implemented:

- (a) Spray the ground sheeting as specified in section 24.10.1(a). Any and all residue must be collected and placed in an appropriate container. Ground sheeting should then be folded from the ends to the middle and placed into single 6-mil or double 4-mil plastic bags for disposal.
- (b) Collect any and all liquid waste in appropriate containers.
- (c) As specified in section 24.10.1(b) the area must be inspected for any spent abrasive, paint, particulate, dust and/or other debris which may have escaped containment and any and all such debris must be collected and placed in single 6-mil or double 4-mil plastic bags or an appropriate container.

- (d) Any and all bags and containers must be securely sealed. Removal and disposal must be in accordance with applicable solid and hazardous waste regulations.

NOTIFICATION OF REMOVAL OF LEAD BASED PAINT

By Certified Exterior Lead Paint Removal Contractor
(Required 5 days in advance of starting date)

Please be advised that lead based paint is about to be removed from the exterior of a structure at the address below.

Address

City/Town, State, Zip

Approximate dates for starting and finishing the project are:

from: _____ to: _____

Lead paint removal is to be done by:

Company Name

Name of Responsible Individual

Address

City/Town, State, Zip

This company has certified with the Department of Environmental Management for environmental regulatory compliance pertaining to removal of exterior lead paint

Certified Exterior Lead Paint Removal Contractor # _____

Method(s) to remove the lead based paint will be:

The paint which will be removed from this structure contains lead. Exposure to lead is unhealthy, particularly to young children. For a copy of Regulation 24 and a summary of the requirements, check the Regulations section at the Department's website at <http://www.state.ri.us/dem>, or call DEM's Office of Technical and Customer Assistance at (401) 222-6822. For information about lead poisoning prevention, call the Department of Health Lead Hotline at (800) 942-7434.

Complaints about improper removal:

8:30 a.m. to 4:00 p.m. weekdays	DEM Office of Compliance and Inspection	(401) 222-1360
At other times	DEM Law Enforcement	(401) 222-3070

All requirements of Rhode Island Air Pollution Control Regulation 24 entitled, " Removal of Lead Based Paint from Exterior Surfaces" must be followed by any person (whether a homeowner or a contractor) who removes paint from the exterior of any structure. Regulation 24 and other pertinent information may be obtained from the Regulations section of the DEM's website at <http://www.state.ri.us/dem>, or by calling:

**Department of Environmental Management
Office of Technical and Customer Assistance
(401) 222 - 6822, 8:30 a.m. to 4:00 p.m. weekdays**

Written notice of the lead paint removal project must be given to the following individuals at least five (5) days prior to starting any exterior lead paint removal:

- **Adults residing in the structure from which lead paint is being removed, and**
- **Adults in residences located within 50 feet of the structure undergoing lead paint removal, and**
- **Owners, agents or property managers of the structure and/or of any building located within 50 feet of the structure undergoing lead paint removal, and**
- **Owners, agents or managers of businesses or organizations located in the structure or within 50 feet of the structure undergoing lead paint removal, and**
- **Principals of schools and the chief administrative officer of every school located within 50 feet of the structure undergoing lead paint removal.**

Request DEM approval to remove lead paint with power washing/pressure washing equipment, or the use of any method not approved in Regulation 24, by contacting DEM's Office of Air Resources at (401) 222-2808 from 8:30 a.m. to 4:00 p.m. weekdays.

Lead paint removal by any procedure considered an alternative procedure, or from structures other than buildings, must not begin until a written approval is issued by DEM's Office of Air Resources.

Questions about disposal of hazardous waste may be directed to DEM's Office of Technical and Customer Assistance (401) 222- 6822, from 8:30 a.m. to 4:00 p.m. weekdays.

Supplemental Information

Contractors: For information about worker protection, contact Providence Area OSHA at (401) 528-4669

Confirmation of Receipt of Lead Pamphlet

I have received a copy of the pamphlet, ***Protect Your Family From Lead in Your Home***, informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before the work began.

Printed name of recipient

Date

Signature of recipient

Self-Certification Option (for tenant-occupied dwellings only)—
If the lead pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

- ☐ Refusal to sign — I certify that I have made a good faith effort to deliver the pamphlet, *Protect your Family From Lead In Your Home*, to the rental dwelling unit listed below at the date and time indicated and that the occupant refused to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.
- ☐ Unavailable for signature — I certify that I have made a good faith effort to deliver the pamphlet, *Protect Your Family From Lead In Your Home*, to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door.

Printed name of person certifying
lead pamphlet delivery

Attempted delivery date and time

Signature of person certifying
lead pamphlet delivery

Unit Address

Note Regarding Mailing Option — *As an alternative to delivery in person, you may mail the lead pamphlet to the owner and/or tenant. Pamphlet must be mailed at least 7 days before renovation (Document with a certificate of mailing from the post office)*

Renovation Notice — *For use in notifying tenants of renovations in common areas of multi-family housing.*

The following renovation activities will take place in the following locations:

Activity (e.g., sanding, window replacement)

Location (e.g., lobby, recreation center)

The expected starting date is _____ and the expected ending date is _____. Because this is an older building built before 1978, some of the paint disturbed during the renovation may contain lead. You may obtain a copy of the pamphlet, *Protect Your Family From Lead in Your Home*, by telephoning me at _____. Please leave a message and be sure to include your name, phone number and address. I will either mail you a pamphlet or slide one under your door.

Date

Printed name of renovator

Signature of renovator

Record of Tenant Notification Procedures — *Procedures Used for Delivering Notices to Tenants of Renovations in Common Areas*

Project Address:

Street (apt. #)

City State Zip Code

Owner of multi-family housing Number of dwelling units

Method of delivering notice forms (e.g. delivery to units, delivery to mailboxes of units)

Name of person delivering notices

Signature of person delivering notices Date of Delivery

Exterior Lead Paint Removal Certification Program

Certification Forms





Rhode Island Department of Environmental Management Exterior Lead Paint Removal Certification Program 2005 Certification Participation Form & Checklist

Anyone engaged in the removal of lead-based paint from exterior surfaces must comply with all applicable state and federal environmental regulations, including the Rhode Island Department of Environmental Management's (DEM) Air Pollution Control Regulation No. 24, as well as federal pre-renovation education requirements. Compliance certification helps individuals and contractors avoid violations and costly penalties, while protecting the environment. *Participation in this program qualifies individual companies to be placed on the DEM list of certified painting contractors, which is posted on the Department's website.*

- Please read the Certification Workbook before completing this form -

Section A: Business Information

Business Name: _____

Business Street Address: _____ **Phone #:** _____

City/Town: _____ **Fax #:** _____

State/Zip Code: _____ **Number of Employees:** _____

Contact Person: _____

Owner Name: _____
(Please Print)

E-mail Address: _____ (Optional)

Average Number of Exterior Paint Removal Contracting Jobs per Year: _____

Section B: Federal Pre-Renovation Education Rule (406(b))

(<http://www.epa.gov/lead/leadinfo.htm#remodeling>)

B1 Federal regulation requires that contractors, property managers, and others who perform renovations for compensation (including paint removal of more than 2 sq. ft.) in residential houses and apartments that may contain lead-based paint (built before 1978) provide the EPA pamphlet titled, *“Protect Your Family from Lead in Your Home”* to owners and occupants and receive a signed statement of receipt of the pamphlet before starting work. Do you meet this requirement?

☐ Yes

☐ No

Section C: Air Pollution Control Regulation # 24 Compliance Checklist (Site Preparation)

C1 Does your business remove exterior lead paint in preparing the surface for repainting?
(Any dwelling that is older than 1978 could contain lead-based paints)

☐ Yes

☐ No

If you answered **“Yes”**, please continue to C.2. If you answered **“No”**, your business is exempt from Regulation # 24, but must still comply with Regulation # 5, “Fugitive Dust”. If **“Not Sure”**, please read below:

According to RIDEM Regulation # 24, "Lead-based paint" means any surface coating material that contains more than 0.05% lead by weight calculated as lead metal in the dried solid. To determine if paint does not contain lead, laboratory testing can be performed on paint chips samples at nominal cost by local environmental analytical laboratories.

Please answer the following questions regarding compliance with Regulation # 24:

Do you certify that the following is done?

- C2.** When removing exterior lead paint, do you inform, in writing, adults living in the structure from which the paint is being removed at least five days prior to the removal project?

☐

Yes

☐

No

- C3.** When removing exterior lead paint, do you inform in writing, all adults living in residences, managers of businesses, and principals of schools located within fifty (50) feet of the structure undergoing lead paint removal at least five (5) days prior to the removal project?

☐

Yes

☐

No

- C4.** Do you adequately cover the ground at the removal site such as with an impenetrable tarpaulin, to collect lead paint debris?

☐

Yes

☐

No

- C5.** Do you remove items like toys, play equipment, and furnishing within fifty (50) feet of the lead paint removal project, or cover them with an impenetrable material?

☐

Yes

☐

No

- C6.** If you notice lead paint debris falling beyond the ground sheeting, do you extend the ground cover or erect vertical containment?

☐

Yes

☐

No

- C7.** Do you submit a plan to DEM's Office of Air Resources for approval prior to starting any paint removal operations for structures other than buildings? *(The plan must describe the type of removal to be utilized and measures to be employed for preventing contamination of the environment with lead)*

☐

Yes

☐

No

Section D: Air Pollution Control Regulation # 24 Compliance Checklist (Approved Removal Methods)

- D1.** Do you certify to use only the following methods when removing exterior lead paint?

☐

Yes

☐

No

(If "No", See **D2**)

Please check methods used:

☐

Wet Manual Scraping: Paint surfaces must be misted with water just prior to scraping

☐

HEPA Equipped Mechanical Sanding or Scraping: Allowed as long as sander or scraper is equipped with a HEPA vacuum unit. Sanding pad or scraping disc cannot be wider than the shingle or clapboard exposure. All doors and windows on paint removal side must be closed and sealed. Air conditioners must be shut off and covered.

☐

HEPA Equipped Dry Abrasive: Abrasive-blasting system must be equipped with a HEPA vacuum that collects paint debris at the blasting head. All doors and windows on paint removal side must be closed and

sealed. Air conditioners must be shut off and covered.

☐ **Wet Abrasive:** Vertical containment must be used to prevent any and all debris generated by the operation from going beyond ground sheeting. Any and all liquid waste containing lead must be collected and handled in accordance with DEM Solid and Hazardous Waste Regulations (see Cleanup/Disposal Compliance).

☐ **Heat Removal:** No open flame is permitted. Heat gun devices cannot exceed 1,000 °F.

☐ **Chemical Removal:** Allowed as long as stripper is nonflammable and contains no methylene chloride

D2. If you use methods other than the above, including high pressure power washing that removes lead paint, you must comply with the following:

*A description of alternative methods for paint removal **must** be submitted to, and **approved** by DEM's Office of Air Resources, **prior to removing paint**. To request approval for an Alternative Procedure, you must seek approval from DEM's Office of Air Resources, 235 Promenade Street, Providence, RI 02908-5767, Attn: Mr. Ted Burns, (401) 222-2808, or Fax: (401) 222-2017.*

Do you certify that you comply with this requirement?

☐ Yes

☐ No

Section E: Clean-up/Disposal Compliance Checklist

Do you certify that the following is done?

E1. At the end of each day, do you collect all lead paint-related debris, including liquid waste, in containers, and store them in an area not easily accessible to the public

☐ Yes

☐ No

E2. At the end of each day, do you inspect the area for leftover lead paint debris, and remove sheeting and store it away from public access?

☐ Yes

☐ No

E3. At the end of the project, do you properly dispose of all containers of lead paint debris and liquid waste, including sheeting and ground cover, and inspect the area for lead paint debris?

☐ Yes

☐ No

E4. Do you dispose of lead paint and debris in accordance with DEM Solid and Hazardous Waste Regulations, using one of the methods listed below:

- Disposed of as household solid waste by homeowner/occupant or their representative, through use of curb side collection, community sponsored transfer station, or household hazardous waste collection
- Removed from site and tested to determine whether material is solid waste or hazardous waste; with disposal through an intermediate facility, that facility could be considered a generator of hazardous waste. (see Disposal Guidelines)
- Removed from commercial or industrial property, managed per DEM Rules & Regulations for Hazardous Waste Management

☐ Yes

☐ No

Air Pollution Control Regulation # 24 found at <http://www.state.ri.us/dem/pubs/regs/REGS/AIR/AIR24-93.PDF>

Additional Information - Regulation # 24 found at <http://www.state.ri.us/dem/pubs/regs/regs/air/leadchuz.htm>

Section F: Election to Participate & Certification Statement

I _____, hereby declare the following:

1. That I elect to participate in DEM's Exterior Lead Paint Removal self-certification program
1. That I have personally examined and am familiar with the information contained in this submittal, including any and all documents or attachments accompanying this certification statement.
2. That the information that I have provided and is contained in this submittal is, to the best of my knowledge, true, accurate, and complete.
3. That I am authorized to make this attestation on behalf of this business.

NOTES:

1. **By participating in this program, you are entitled to promote your company's participation in the Rhode Island Department of Environmental Management's Exterior Lead Paint Removal Certification Program. Also, your company information will be placed on list of Certified Exterior Lead Paint Removal Contractors on the DEM website at <http://www.state.ri.us/dem/programs/benviron/assist/index.htm>.**
2. **As a program participant, in addition to submitting this completed form, you agree to:**
 - Complete and give a completed *Project Checklist* to owners or occupants where exterior lead paint removal operations are being conducted before the project is begun.
 - As required by federal law, provide a copy of the pamphlet, *Protect Your Family from Lead in Your Home*, to owners/occupants of pre-1978 housing where paint removal activities will take place before starting work, and obtain a signed acknowledgement of receipt of the pamphlet.

NOTE: All contractors operating in the State of Rhode Island (whether certified or not) are subject to random/targeted inspections, and MUST be in compliance with environmental regulations at all times.

I certify that the information that I have provided in this form is true, accurate and complete, to the best of my knowledge.

Signature: _____ Date: _____

Printed Name: _____ Title: _____

Complete and Return this form to:

**Rhode Island Department of Environmental Management
Exterior Lead Paint Removal Certification Program
Office of Technical and Customer Assistance
235 Promenade Street
Providence, RI 02908-5767**

Please keep a copy of this Form & Checklist for your records



Rhode Island Department of Environmental Management

Exterior Lead Paint Removal Certification Program

Project Checklist

*This form must be completed and provided to the owner/occupant before the project is begun
Owner/Occupant: Keep this Checklist for Your Records*

Section A: Contractor Information

Business Name: _____

Street Address: _____ Phone #: _____

City/Town: _____ Zip Code: _____

Contact Person: _____ Owner: _____

Name of Owner/Occupant, and address of home where exterior lead paint removal will be conducted:

Check off the following requirements in each Section, that must be complied with

Section B: Federal Pre-Renovation Education Rule (406(b))

(<http://www.epa.gov/lead/leadinfo.htm#remodeling>)

- B1. Federal regulation requires that contractors, property managers, and others who perform renovations for compensation (including paint removal of more than 2 sq. ft.) in residential houses and apartments that may contain lead-based paint (built before 1978) provide the EPA pamphlet titled, ***“Protect Your Family from Lead in Your Home”*** to owners and occupants and receive a signed statement of receipt of the pamphlet before starting work. ☐

Section C: Air Pollution Control Regulation # 24 Compliance Checklist (Site Preparation)

- C1. At least five (5) days prior to the exterior lead paint removal project, the following persons were informed in writing about the project: adults living in the structure from which the paint is being removed; and all adults living in residences, managers of businesses and principals of schools located within fifty (50) feet of the structure undergoing lead paint removal. ☐
- C2. Ground will be adequately covered (such as with a impenetrable tarpaulin) and all toys, play equipment, and furnishings within fifty (50) feet of the lead paint removal project will be removed or covered with a leak proof material. ☐
- C3. If lead paint debris is noticed falling beyond the ground sheeting, ground cover will be extended, vertical containment shrouds will be erected. ☐
- C4. If applicable, a plan will be submitted to DEM’s Office of Air Resources for approval prior to starting any lead paint removal operations for structures other than buildings (*The plan must describe the type of removal to be utilized and measures to be employed to prevent contamination of the environment with lead.*) ☐

Section D: Air Pollution Control Regulation # 24 Compliance Checklist (Approved Removal Methods)

D1. Check which of the following methods will be used when removing exterior lead paint on this project

- ☐ (a) Wet Manual Scraping: Paint surfaces must be misted with water just prior to scraping
- ☐ (b) HEPA Equipped Mechanical Sanding or Scraping: Allowed as long as sander or scraper is equipped with a HEPA vacuum unit that immediately captures all abrasive, dust, paint, or other debris generated by the operation. Sanding pad or scraping disc cannot be wider than the shingle or clapboard exposure. All doors and windows on paint removal side must be closed and sealed. Air conditioners must be shut off and covered.
- ☐ (c) HEPA Equipped Dry Abrasive: Abrasive-blasting system must be equipped with a HEPA vacuum that collects paint debris at the blasting head. All doors and windows on paint removal side must be closed and sealed. Air conditioners must be shut off and covered.
- ☐ (d) Wet Abrasive: Vertical containment must be used to prevent any and all debris generated by the operation from going beyond ground sheeting. Any and all liquid waste containing lead must be collected and handled in accordance with DEM Solid and Hazardous Waste Regulations (see Section D).
- ☐ (e) Heat Removal: No open flame is permitted. Heat gun devices cannot exceed 1,000 °F.
- ☐ (f) Chemical Removal: Allowed as long as stripper is nonflammable and contains no methylene chloride.
- ☐ (g) I will not use any of the above methods. *I have obtained in writing from DEM's Office of Air Resources, approval for use of alternative methods for paint removal, that is required prior to removing paint.*

Section E: Cleanup/Disposal Compliance Checklist

E1. The project will comply with daily and end of project cleanup, inspection, and storage requirements ☐

E2. Disposal method to be used for lead paint removed and debris

- ☐ (a) Disposed of as household solid waste by homeowner/occupant or their agent, through use of curb side collection, community sponsored transfer station, or household hazardous waste collection
- ☐ (b) Removal from site and tested to determine whether material is solid waste or hazardous waste; with disposal through intermediate facility, that facility could be considered a generator of hazardous waste
- ☐ (c) Removed from commercial or industrial property, managed per DEM Rules & Regulations for Hazardous Waste Management

I certify that the above information is accurate and complete for exterior lead paint removal activities for this project.

Signature: _____ Date: _____

**Rhode Island Department of Environmental Management
Office of Technical & Customer Assistance
235 Promenade Street
Providence, RI 02908
Telephone: (401) 222-6822, Ext. 4412
Fax: (401) 222-3810**

Information about Exterior Lead Paint Removal found at <http://www.state.ri.us/dem/programs/benviron/assist/index.htm>

